

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF GEORGIA  
ATLANTA DIVISION**

DONNA CURLING, *et al.*

*Plaintiffs,*

v.

BRAD RAFFENSPERGER, *et al.*,

*Defendants.*

CIVIL ACTION

FILE NO. 1:17-cv-2989-AT

**STATE DEFENDANTS' SUPPLEMENTAL NOTICE REGARDING NEW  
ELECTION SYSTEM VENDOR CONTRACT**

State Defendants submit this supplemental notice to provide the Court with additional information regarding Solicitation No. 47800-SOS0000037 - Statewide Voting System (the “Solicitation”), by which the State intends to purchase a new voting system that creates a voter-verifiable paper ballot using ballot-marking devices (“BMDs”) as provided in 2019-2020 Georgia House Bill 316. This new system will replace the entirety of the existing DRE system, including the GEMS servers, DREs, and ExpressPoll units.

As the Court is aware, a Notice of Intent to Award (“NOIA”) for the Solicitation was issued on July 29, 2019 naming Dominion Voting Systems, Inc. as the successful offeror. Under Section 6.2.2.1 of the Georgia Procurement Manual (“GPM”), a final Notice of Award (“NOA”) may not be issued until 10 days have

passed from the publication of the NOIA. This period has now expired, and no protest was received by the State. Accordingly, the Secretary of State's Office and Dominion will not be burdened by a protest during implementation of the BMDs and HB316. A true and correct copy of the NOA issued today, August 9, 2019, is attached hereto as Exhibit A.

In addition, the Secretary of State has certified that the Dominion Voting System procured pursuant to the Solicitation meets all applicable provisions of the Georgia Election Code and the Rules of the Secretary of State. A true and correct copy of Certification of the Dominion Voting System for Georgia issued today, August 9, 2019, is attached hereto as Exhibit B.

Respectfully submitted this 9<sup>th</sup> day of August, 2019.

/s/ Vincent R. Russo  
Vincent R. Russo  
Georgia Bar No. 242628  
vrusso@robbinsfirm.com  
Josh Belinfante  
Georgia Bar No. 047399  
jbelinfante@robbinsfirm.com  
Carey A. Miller  
Georgia Bar No. 976240  
cmiller@robbinsfirm.com  
Kimberly Anderson  
Georgia Bar No. 602807  
kanderson@robbinsfirm.com  
Alexander Denton

Georgia Bar No. 660632  
adenton@robbinsfirm.com  
Brian E. Lake  
Georgia Bar No. 575966  
blake@robbinsfirm.com  
Robbins Ross Alloy Belinfante Littlefield LLC  
500 14th Street, N.W.  
Atlanta, Georgia 30318  
Telephone: (678) 701-9381  
Facsimile: (404) 856-3250

Bryan P. Tyson  
Georgia Bar No. 515411  
btyson@taylorenglish.com  
Bryan F. Jacoutot  
Georgia Bar No. 668272  
bjacoutot@taylorenglish.com  
TAYLOR ENGLISH DUMA LLP  
1600 Parkwood Circle  
Suite 200  
Atlanta, GA 30339  
Telephone: (678)336-7249

*Counsel for State Defendants*

**CERTIFICATE OF COMPLIANCE**

Pursuant to L.R. 7.1(D), the undersigned hereby certifies that the foregoing  
**STATE DEFENDANTS' SUPPLEMENTAL NOTICE REGARDING NEW**  
**ELECTION SYSTEM VENDOR CONTRACT** has been prepared in Times New  
Roman, 14 pt., a font and type selection approved by the Court in L.R. 5.1(B).

/s/ *Vincent R. Russo*  
Vincent R. Russo  
Georgia Bar No. 242628

**CERTIFICATE OF SERVICE**

I hereby certify that I filed the foregoing **STATE DEFENDANTS' SUPPLEMENTAL NOTICE REGARDING NEW ELECTION SYSTEM VENDOR CONTRACT** with the Clerk of Court using the CM/ECF system, which will automatically send counsel of record e-mail notification of such filing:

This 9<sup>th</sup> day of August, 2019.

*/s/ Vincent R. Russo*  
Vincent R. Russo